

JUN 03 2009

Mr. Gary Blackburn  
Bureau of Environmental Remediation  
Kansas Department of Health and Environment  
1000 SW Jackson Street, Suite 410  
Topeka, Kansas 66612-1367

Re: Standard Products  
920 South St Francis Wichita, Kansas



Dear Mr. Blackburn:

As you may be aware, the Superfund removal program of the U.S. Environmental Protection Agency (EPA) is expecting to begin a removal action for the Standard Products site in Wichita, Kansas. To perform this action, EPA will attempt to comply, to the extent practicable, with all applicable or relevant and appropriate state requirements (ARARs) listed or new ones that you may supply us. This letter formally requests that the state of Kansas identify any potential ARARs for this site. An action memorandum has been drafted for this site and a copy is enclosed.

We request that an appropriate state official identify potential ARARs in the enclosed tables. To qualify as state ARARs, these requirements must be promulgated. A state requirement is promulgated if it is legally enforceable and of general applicability.

The tables are divided into three sections addressing the following categories: chemical-specific requirements, location-specific requirements, and action-specific requirements. Chemical-specific requirements are health- or risk-based numeric values that establish the acceptable amount or concentration of a chemical that may be found in or discharged to the ambient environment. Location-specific requirements are restrictions placed on the concentration of hazardous substances or the conduct of activities solely because they occur in special locations. For example, a location-specific requirement demands that hazardous waste storage facilities, if located within 100-year flood plains, must be designed, constructed, operated, and maintained in a manner that avoids washout. Action-specific requirements are technology- or activity-based requirements or limitations on actions taken with respect to hazardous waste.

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Any state policies or guidance will be considered, even if they are not ARARs. EPA will examine your responses to determine whether they are applicable or relevant and appropriate to the site to the extent practicable. It is important to clarify, however, that all potential state ARARs identified in the tables may not be met during the removal.

Your timely response will ensure that Kansas requirements will be considered when conducting the removal action. EPA requests that all information concerning state ARARs be received in writing within 30 days of the date of this letter. Also, please feel free to contact Randy Schademann, On-Scene Coordinator, at (913) 551-7331, or me at (913) 551-7882, if additional information on the site is needed for the purpose of completing the enclosures.

Sincerely,

Mary Peterson, Chief  
Planning and Preparedness North Section  
Superfund Division

Enclosure

Potential  
State ARARs

TABLE 1 CHEMICAL-SPECIFIC REQUIREMENTS

Chemical	Maximum Concentration Allowed	Medium	Reason Why Requirement is an ARAR	Regulatory Citation

TABLE 2 LOCATION-SPECIFIC REQUIREMENTS

Location Subject to Requirement	Requirement	Reason Why Requirement is an ARAR	Regulatory Citation

TABLE 3 ACTION-SPECIFIC REQUIREMENTS

Action Subject to Requirement	Requirement	Reason Why Requirement is an ARAR	Regulatory Citation